Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of	)	
	)	
The Use of N11 Codes and	)	CC Docket No. 92-105
Other Abbreviated Dialing Arrangements	)	
	)	
	)	

Comments of
Mitchell D. Travers

Herein Comments address Section IV. Further Notice of Proposed Rulemaking, subsection B. Access to Telecommunications Relay Services.

Mitchell D. Travers
7728 Ora Court
Greenbelt, MD 20770
301-441-2666/TTY
301-441-2715/Fax, Voice
mtravers@48i.com

March 31, 1997

The Federal Communications Commission is to be commended for their efforts in striving to increase access to telecommunications equipment and services by persons with disabilities in this and other proceedings.

My knowledge, skills, and experiences with telecommunications issues stem from the following roles and activities:

- Moderator of the electronic Telecommunications Relay Services forum (eTRSf) on the World Wide Web at www.48i.com/etrsf and via email at etrsf@48i.com. Many issues about telecommunication relay services and related technologies impacting TRS for deaf, hard-of-hearing, and speech-disabled people are discussed in this moderated forum among relay users, federal and state agencies, state regulatory bodies, nonprofit consumer and professional organizations, advisory councils and committees, telecommunications services providers and vendors. At present, there are 430 direct email eTRSf participants, over 750 regular visitors to eTRSf's Web site in the one year the Web site has been available, and eTRSf postings are reposted in numerous other Internet-based forums and reprinted in a number of print-based media.
- Member of the Maryland Governor's Advisory Board for Telecommunications Relay (GABTR).
- Chair of the Maryland Association of the Deaf's Telecommunications Relay Services Committee.
- Vice Chair of the National Association of the Deaf Telecommunications Committee's (NADTC) Public Access Division encompassing four committees addressing Telecommunications Relay Services, Public Facilities and Transportation, 9-1-1 Access, and Computers.
- Perot Systems Corporation (Reston, VA) Associate performing telecommunications information systems development of provisioning, customer care, billing, audits & controls systems supporting network elements for long distance and local wireline carriers and wireless carriers.
- Frequent user of TRS since their advent after the passage of the Americans with Disabilities (ADA) Act in New York, New Jersey, Maryland, Virginia and occasional user of TRS in Delaware, Kentucky, Florida, Georgia. This list does not include the locations of relay centers that have actually performed relay calls for me due to routing caused by Next Available Agent (NAA) technologies installed by the major TRS providers.
- Frequent user of private and fee-paid relay as well as volunteer service organizations in the pre-ADA days of TRS services in New York, New Jersey, Maryland, Virginia and Washington, DC.

The Commission indicates (at 68) that it understands "switch-based N11 in the context of TRS to mean that the N11 dialing information would be stored in the switch, and when TRS users in a calling area dial the N11 code, the telecommunications carrier's end office switch would automatically route the call to the relay center." The Commission also "asks parties if it would be possible to develop an N11 'gateway' " and describes its feature in the following way "With such a gateway, a database query would be launched, and parties would be able to select their TRS provider, or parties would have their calls routed to a presubscribed TRS provider." In

addition, the Commission requests "comment on whether any other important disability services could be accessed through the same gateway and whether such a gateway would be consistent with Section 255 of the Act."

Such a gateway is an excellent concept and is one that deserves serious exploration as to what it would take to actually implement it and such serious exploration has been initiated in a significant way by this proceeding (at 55 and 67).

For the purposes of obtaining answers as to " (2) whether implementation is technically feasible, and if so, the details of such implementation; (3) the projected costs of implementation and how those costs should be recovered" (at 67), this gateway concept should be expanded to be one that is also an ANTICS gateway. ANTICS is an acronym that I have developed to represent Automated Non-TTY Initiated Calling System. As a topic of discussion in the electronic Telecommunications Relay Services forum (eTRSf), ANTICS has met with postive and encouraging feedback..

The ANTICS concept makes it possible for hearing callers to dial TTY users directly with the relay services automatically connected as well. Here's how it would work:

1. When a telephone call is initiated by a non-TTY (and non-ASCII) caller to a TTY-user by dialing the TTY user's telephone number, this call would automatically be routed by the ANTICS gateway to a TRS center which, in turn, would automatically dial (the TTY User's ANI is passed to the TRS center by ANTICS) the TTY user's telephone resulting in the situation where when the TTY user's telephone first rings, both the non-TTY caller and the relay operator are on the other end waiting for the TTY-user's telephone to be answered.

2. The TTY-user's telephone begins ringing only when the TRS center dials it and this is when the non-TTY caller will begin hearing the telephone ring. While the call is being handled by ANTICS, the non-TTY caller would hear a different sound.

3. The TTY-user would have the capability to use his or her telephone to activate and deactivate ANTICS at any time and as often as is needed.

4. If necessary, as an interim measure all until such a time that activation and deactivation capability can be installed, it will be acceptable to implement ANTICS without the activation and deactivation capability so that TTY-users may have the option to elect to use ANTICS at all times or not at all.

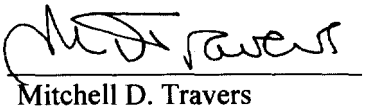
Such an expanded ANTICS gateway would be entirely would be consistent with Section 255 of the Act.

An ANTICS-enabled gateway will, I believe, contribute significantly to achieving real functional equivalence to using telephones among non-TTY callers and TTY-users. First, all non-TTY callers would not need to know nor understand anything about relay telephone numbers and could just immediately and directly dial the TTY-user's telephone number. Immediately dialing the TTY-user's telephone number constitutes the path of least resistance and is an activity identical to that of dialing all other standard telephone numbers. Secondly, all TTY-users would need to give only one telephone number to all and any actual and potential non-TTY callers and that single telephone number would be their work or home telephone number (or both as the case

may warrant). Additionally, TTY users would not need to caution the non-TTY caller and explain that he or she must, first, dial the relay telephone number (either the 800 or 711 number) and, then, provide the relay service communication assistant with the "real" telephone number to be dialed. Requiring the non-TTY caller to do so represents a nontrivial and substantially noticeable deviation from the non-TTY caller's path of least resistance and usual daily practice of using his or her telephone.

What I have described in this Comment is an outline for implementing ANTICS functionality. There are many procedural details that would need to be worked out but they are just that, procedural details. An example of such a procedural detail might be determining how to implement ANTICS for multi-use telephone lines, i.e., homes that have both non-TTY and TTY users. But, the most important first step is to obtain answers to two questions: "(2) whether implementation of ANTICS is technically feasible, and if so, the details of such implementation; (3) the projected costs of implementation and how those costs should be recovered" (at 67). I trust such answers will be forthcoming in the Reply Comments of this proceeding as well as a result of additional investigative and research efforts by the Commission.

Respectfully submitted,

By: 

Mitchell D. Travers
7728 Ora Court
Greenbelt, MD 20770
301-441-2666/TTY
301-441-2715/Fax, Voice
mtravers@48i.com

March 31, 1997